

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

THIRD DECLARATION OF LEITA WALKER

I, Mary Andreleita (“Leita”) Walker, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Ballard Spahr LLP in Minneapolis, Minnesota, and lead counsel for Defendant Netflix, Inc., in the above-referenced matter. I have personal knowledge of the matters set forth herein, and I make this declaration in support of Netflix’s Motion for Summary Judgment.

2. Contrary to Plaintiff Andrew Colborn’s assertion that “*Defendants* produced a total of 5 emails” post-dating December 18, 2015, Netflix produced in discovery approximately 280 emails and attachments dated on or after December 18, 2015. *See, e.g.*, NFXCOL0000441-0002359.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an email thread between Laura Ricciardi, Moira Demos, and executives from Netflix, produced by the Producer Defendants in this matter at Bates No. CHRM000006.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the transcript of the deposition of Adam Del Deo in this matter.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the transcript of the deposition of Lisa Nishimura in this matter.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the transcript of the deposition of Andrew Colborn in this matter.

7. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff's Responses to Defendant Chrome Media LLC's First Set of Interrogatories, dated January 28, 2022.

8. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the published book *Indefensible*, by Michael Griesbach.

9. Attached hereto as **Exhibit 7** a true and correct copy of portions of the transcript of testimony on February 19, 2007, Day 6 of the trial in *State v. Avery*, No. 05 CF 381 in the Circuit Court for Manitowoc County, produced by the Producer Defendants in this matter at Bates No. CHRM009267.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 9, 2022

/s/Leita Walker
Leita Walker